

STATE OF MINNESOTA  
IN SUPREME COURT  
A23-1354

**FILED**

October 18, 2023

OFFICE OF  
APPELLATE COURTS

---

Joan Growe, et al.,

*Petitioners,*

v.

Steve Simon, Minnesota Secretary of  
State, et al.

*Respondents.*

---

**RESPONDENT DONALD J. TRUMP'S MOTION  
FOR PERMISSION TO FILE RESPONSE OUT OF TIME**

---

Pursuant to Minn. R. Civ. App. Proc. 126.02 and Minn. R. Civ. App. Proc. 127, Respondent Donald J. Trump seeks permission to file his response to the Petition, notwithstanding the passage of the September 27 deadline established by this Court's September 20, 2023 scheduling order. If permitted, the response will be substantively identical to the response filed on September 27 by Donald J. Trump for President 2024, Inc. (the "Campaign").

The Campaign attempted to file a timely response asserting President Trump's interests, but was unsuccessful for the reasons set forth in this Court's order dated October 13, 2023. Under these circumstances, the failure to meet the deadline was excusable, no prejudice would result from permitting President Trump to re-file the response, and the interests of justice would be served by ensuring that all arguments are properly before this Court.

Dated: October 18, 2023

**CROSSCASTLE PLLC**

*s/Nicholas J. Nelson*

Nicholas J. Nelson (#391984)

Samuel W. Diehl (#388371)

333 Washington Avenue N.

Ste 300-9078

Minneapolis, MN 55401

T: (612) 429-8100

F: (612) 234-4766

E: [nicholas.nelson@crosscastle.com](mailto:nicholas.nelson@crosscastle.com)

[sam.diehl@crosscastle.com](mailto:sam.diehl@crosscastle.com)

**DHILLON LAW GROUP, INC.**

David A. Warrington (VSB No. 72293)

2121 Eisenhower Avenue

Suite 608

Alexandria, VA 22314

T: (703) 574-1206

F: (415) 520-6593

E: [dwarrington@dhillonlaw.com](mailto:dwarrington@dhillonlaw.com)

Mark P. Meuser (CA Bar No. 231335)

Christopher M. Halbohn (TX Bar No.

24109967)

177 Post Street

Suite 700

San Francisco, CA 94108

T: (703) 415.433.1700

F: (415) 520.6593

E: [mmeuser@dhillonlaw.com](mailto:mmeuser@dhillonlaw.com)

[chalbohn@dhillonlaw.com](mailto:chalbohn@dhillonlaw.com)

*Attorneys for Respondent Donald J.  
Trump*